3/2/2021

Case.net: 2122-CC00246 - Docket Entries



ET (E-CASE)

Scheduled Parties & Charges, Judgments Filings Due Garnishments/ Case Header Docket Entries Service Information Civil Hearings & Trials Attorneys Judgments Execution & Sentences

Sort Date Entries: O Descending

Ascending

Display Options: All Entries

02/25/2021 **Summons Issued-Circuit**

Document ID: 21-SMCC-1264, for CENTAUR BUILDING SERVICES, INC...

Summons Issued-Circuit

Document ID: 21-SMCC-1263, for ATALIAN US MIDWEST LLC.

Summons Issued-Circuit

Document ID: 21-SMCC-1262, for ATALIAN US SHARED SERVICES LLC.

02/19/2021 Motion for Leave

Plaintiffs Motion for Leave to File Second Amended Petition.

Filed By: MARY ANNE OLWELL SEDEY On Behalf Of: JAYNE SALERNO

02/17/2021 Jury Trial Scheduled

Scheduled For: 08/02/2021; 9:00 AM; MICHAEL FRANCIS STELZER; City of St. Louis

02/16/2021 Request Filed

Request for Special Process Server.

Filed By: MARY ANNE OLWELL SEDEY On Behalf Of: JAYNE SALERNO

Amended Motion/Petition Filed

Second Amended Petition.

Filed By: MARY ANNE OLWELL SEDEY On Behalf Of: JAYNE SALERNO

02/05/2021 Notice of Service

> Servers Return Atalian Amended Petition. Filed By: MARY ANNE OLWELL SEDEY

On Behalf Of: JAYNE SALERNO

Notice of Service

Servers Return Centaur Amended Petition. Filed By: MARY ANNE OLWELL SEDEY

Corporation Served

Document ID - 21-SMCC-867; Served To - ATALIAN GLOBAL SERVICES INC; Server - ; Served Date -04-FEB-21; Served Time - 11:37:00; Service Type - Special Process Server; Reason Description -Served; Service Text - served Amanda Brandon - Intake Specialist CT Corp

Corporation Served

Document ID - 21-SMCC-866; Served To - CENTAUR BUILDING SERVICES, INC.; Server -; Served Date - 04-FEB-21; Served Time - 10:10:00; Service Type - Special Process Server; Reason Description 3/2/2021 Case.net: 2122-CC00246 - Docket Entries

- Served; Service Text - served Rusty Smith- Designee

02/04/2021 Summons Issued-Circuit

Document ID: 21-SMCC-867, for ATALIAN GLOBAL SERVICES INC.

Summons Issued-Circuit

Document ID: 21-SMCC-866, for CENTAUR BUILDING SERVICES, INC..

Request Filed

Request for Special Process Server.

Filed By: MARY ANNE OLWELL SEDEY
On Behalf Of: JAYNE SALERNO

Summons Issued-Circuit

Document ID: 21-SMCC-864, for COGENCY GLOBAL, INC..

02/03/2021 Amended Motion/Petition Filed

AMENDED PETITION.

Filed By: MARY ANNE OLWELL SEDEY **On Behalf Of:** JAYNE SALERNO

Notice of Service Servers Return.

Filed By: MARY ANNE OLWELL SEDEY
On Behalf Of: JAYNE SALERNO

02/01/2021 Summons Issued-Circuit

Document ID: 21-SMCC-810, for CENTAUR BUILDING SERVICES, INC..

Request Filed

Request for Appointment of Process Server.

Filed By: MARY ANNE OLWELL SEDEY

On Behalf Of: JAYNE SALERNO

Filing Info Sheet eFiling

Filed By: MARY ANNE OLWELL SEDEY

Pet Filed in Circuit Ct

PETITION; CIVIL FILING INFO SHEET.

Filed By: MARY ANNE OLWELL SEDEY

On Behalf Of: JAYNE SALERNO

Judge Assigned

Case.net Version 5.14.12 Return to Top of Page Released 11/10/2020

2122-CC00246

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS STATE OF MISSOURI

JAYNE SALERNO,	
Plaintiff, v.)) Case No
CENTAUR BUILDING SERVICES, INC.,	JURY TRIAL DEMANDED
Defendant.))
Serve:)
Registered Agent)
J. Fred Kolb)
4401 Ridgewood Avenue)
St. Louis, MO 63116)

PETITION

DISCRIMINATION IN VIOLATION OF THE MISSOURI HUMAN RIGHTS ACT

Plaintiff Jayne Salerno brings her claim of age discrimination under the Missouri Human Rights Act to redress injuries done to her by Defendant Centaur Building Services, Inc. In support thereof, Plaintiff states:

PARTIES, JURISDICTION, AND VENUE

- Plaintiff brings this action under the Missouri Human Rights Act, Mo. Rev. Stat.
 § 213.010 et seq., as amended ("MHRA").
- 2. Plaintiff Jayne Salerno is a citizen of the State of Missouri, currently residing in St. Louis, Missouri. Ms. Salerno's date of birth is XX-XX-1957, and at the time Defendant terminated her, she was 62 years old.
- 3. Defendant Centaur Building Services, Inc. is a corporation authorized to do business in Missouri with its headquarters located at 4401 Ridgewood Avenue in the City of St. Louis. Centaur Building Services, Inc. provides facility services, such as janitorial services, for commercial buildings.

- 4. At all relevant times, Plaintiff Salerno worked for Defendant in an office located at 4401 Ridgewood Avenue in the City of St. Louis.
- 5. The unlawful employment practices complained of herein were committed within the county of St. Louis City, Missouri. Jurisdiction and venue in this Court are, therefore, proper pursuant to Mo. Rev. Stat. § 231.111.
- 6. Defendant has more than six (6) employees and is, therefore, an employer within the meaning of the MHRA, Mo. Rev. Stat. § 213.010(7).
- 7. On May 14, 2020, Plaintiff filed a timely charge of age discrimination against Defendant with the Missouri Commission on Human Rights.
- 8. On November 13, 2020, the Missouri Commission on Human Rights issued to Plaintiff its Notice of Right to Sue, and this action was initiated within ninety days thereof.

FACTUAL ALLEGATIONS

- 9. Plaintiff Salerno worked for Centaur Building Services as an Area Recruiter.
- 10. Ms. Salerno brought considerable experience to her role as Area Recruiter. At her hire, she had over twenty years of experience in Human Resources and full cycle recruiting.
- 11. Throughout her career, Plaintiff garnered solid performance reviews and consistent pay raises. She never received any written or verbal discipline. At all times, Plaintiff met Defendant's legitimate performance expectations.
- 12. Plaintiff was one of three Human Resources employees in the St. Louis office. The other two employees, Ms. Range and Ms. Harris, were in their thirties, had no previous experience in human resources, and were hired as administrative staff.
- 13. In the spring of 2019, Plaintiff's supervisor, Jaclyn Bovinett, severed her employment with Defendant.
 - 14. Defendant hired Dan Kosinski as Plaintiff's new supervisor.

- 15. Upon information and belief, Kosinski is in his early thirties and over thirty years younger than Plaintiff.
- 16. Kosinski supervised Plaintiff and five other recruiters. The group had a weekly conference call regarding recruitment efforts.
 - 17. Four of the five other recruiters are significantly younger than Plaintiff Salerno.
- 18. Around this time, Defendant changed its recruitment model. Previously, Plaintiff was responsible for recruiting, interviewing, and placing applicants for janitorial, or "facility services," positions.
- 19. At each site where Defendant provided facility services, an Operations Manager supervised Defendant's employees. An Operations Manager in Plaintiff's territory typically supervised about ten to twenty sites.
- 20. In the new model, Defendant required Operations Managers to interview potential new hires.
- 21. Kosinski asked Plaintiff to coordinate onsite interviews with Operations

 Managers and continue to recruit new hires, perform drug screens and background checks, issue
 uniforms, and assist new hires with online access.
- 22. To prepare the Operations Managers, Plaintiff held at least six interview training sessions for Operations Managers in her territory.
- 23. Plaintiff's workload was differed than the workload of the other recruiters.

 Plaintiff's territory contained more sites with smaller numbers of janitorial staff. She recruited for more than 100 sites. Other Area Recruiters worked with bigger sites with large numbers of janitorial staff. It was easier for other Area Recruiters to schedule group interviews with Operations Managers.

- 24. Additionally, whereas other Area Recruiters managed openings of 3 to 19 positions per week, Plaintiff consistently recruited for 11 to 30 positions every week.
- 25. Plaintiff adapted well to the new recruitment model, even though she had a larger workload than other Area Recruiters. Mr. Kosinski never criticized her work performance and gave her positive feedback on the group conference calls.
- 26. Despite her success, on November 14, 2019, Defendant terminated Plaintiff without warning.
- 27. Arron Rhodes, Regional Human Resources Manager, met with Plaintiff on November 14, 2019. Mr. Rhodes is in his thirties and approximately thirty years younger than Plaintiff.
- 28. Douglas Comerio, Executive Vice President of the Midwest Region, was also present in the termination meeting. Mr. Comerio is approximately forty years old and approximately twenty years younger than Plaintiff.
- 29. Mr. Rhodes told Plaintiff that Defendant was terminating her due to an organizational restructuring. He did not offer additional details.
 - 30. Additionally, Mr. Rhodes did not offer Plaintiff a different position.
- 31. Plaintiff felt shocked. She was committed to her career and had never received negative feedback about her work performance.
- 32. A few weeks later, Defendant posted an advertisement seeking applications for Plaintiff's position.
- 33. Upon information and belief, Defendant hired Ashley Lane, a woman in her twenties, to replace Plaintiff.
 - 34. Defendant's termination of Plaintiff constitutes age discrimination.

- 35. In violation of the MHRA, Defendant's decided to terminate Plaintiff on account of her age.
- 36. Defendant, by its actions and failures to act, including but not limited to those described above, discriminated against Plaintiff on the basis of age in violation of the MHRA.
- 37. As a result of Defendant's actions and failures to act described herein, Plaintiff suffered emotional pain, distress humiliation, inconvenience, mental anguish and loss of enjoyment of life.
- 38. As a result of Defendant's conduct and the actions described herein, Plaintiff has suffered and will continue to suffer lost wages and benefits of employment.
- 39. As a result of Defendant's conduct and the actions described herein, Plaintiff has incurred and will continue to incur attorneys' fees, costs and expenses of suit.

WHEREFORE, Plaintiff prays that this Court will, after trial by jury, enter judgment in her favor and against Defendant and, in amounts to be determined at trial, for actual damages, including past and future lost income, compensatory damages, punitive damages, prejudgment interest, and attorneys' fees and costs of suit, and for such other relief as justice requires.

SEDEY HARPER WESTHOFF, P.C. Attorneys for Plaintiff

/s/ Mary Anne Sedey

Mary Anne Sedey #26731 Claire Bruner-Wiltse #69434 2711 Clifton Avenue St. Louis, MO 63139 314/773-3566 314/773-3615 (fax) msedey@sedeyharper.com cbruner-wiltse@sedeyharper.com

2122-CC00246

Confidential Case Filing Information Sheet - Non-Domestic Relations

INSTRUCTIONS:

- Complete this form for all parties known at the time of filing. Provide the most appropriate Case Type and Party Type codes and descriptions. (Found on the Case Types List and Party Types List at www.courts.mo.gov on the Court Forms/Filing Information page.)
- ✓ If additional space is needed, complete additional Confidential Case Filing Information Sheets.

NOTE: The full Social Security Number (SSN) is required pursuant to Missouri Supreme Court Operating Rule 4 if the party is a person; exception can only be granted if the information is not reasonably available. This is a confidential record due to the SSN and possible confidential address. However, this information is used to open a case in the Missouri State Courts Automated Case Management System. Cases deemed public under Missouri Revised Statues can be accessed through Case.net. The day and month of birth, SSN, and confidential address are NOT provided to the public through Case.net access.

Filing Date: 2/1/2021	Col	unty: CITY	OF ST. LOUIS	<u> </u>	
Style of Case: JAYNE SA	ALERNO V. CENTAUR BUILD				
TI	(i.e., In the Estate of; In th				
Case Type Code:	Case Type Des	scription: E	MPLOYMENT	DISCRIMINATION	
Party Type Code: PLT	Party Type Description: PLAII	NTIFF			
Name (if a person): (Last)	SALERNO	(First)	JAYNE	(Midd	dle)
Organization (if non-person)	:				
Address: 553 Central Pla	ce				
City: St. Louis				State: MO	Zip: 63122
DOB/DOD: 7/21/57	Gender:	Male	X Female	SSN: 486-66-0213	
Attorney Name (if represent	ed by counsel): MARY ANNE S	EDEY		Bar ID: 26731	Party Type Code : APLT
Party Type Code: DFT	Party Type Description: DEFE	ENDANT			
Name (if a person): (Last)		(First)		(Midd	ile)
Organization (if non-person):	CENTAUR BUILDING SERVI	CES, INC.			
Address: 4401 Ridgewood	d Avenue				
City: St. Louis				State: MO	Zip: 63116
DOB/DOD:	Gender:	Male	Female	SSN:	
Attorney Name (if represent	ed by counsel):	·		Bar ID:	Party Type Code :
Party Type Code:	Party Type Description:				
Name (if a person): (Last)		(First)		(Mido	lle)
Organization (if non-person):					
Address:					
City:				State:	Zip:
DOB/DOD:	Gender:	Male	Female	SSN:	
Attorney Name (if represented	ed by counsel):			Bar ID:	Party Type Code :
Submitted by: MARY AN	NNE SEDEY			Bar ID (required if	attorney): 26731
Address (if not shown a	above): SEDEY HARPER WE	ESTHOFF, 27	711 CLIFTON A	VE.,	
City: ST. LOUIS				State: MO	Zip: 63139
Phone: 314-773-3566		Email Add	dress: msed	ey@sedeyharper.co	 om

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2122-CC00246

In the CIRCUIT COURT City of St. Louis, Missouri

CENTAUR BUILDING SERVICES, INC.

JAYNE SALERNO Plaintiff/Petitioner

VS.

	TOUR CUT	Γ	For File Stamp Only
_	2/1/2021		
	Date	-	
	EF22351350		
	Case number		
_			
	Division		
		- I	

dant/Respondent	Division	
	L	
REQUEST FOR APPOIN	ITMENT OF PROCESS SERV	ER
Comes now JAYNE SALERNO		, pursu
Re	equesting Party	· •
to Local Rule 14, requests the appointmental WILLIAM STAGE	nent by the Circuit Cierk of PO BOX 4932, ST. LOUIS MO 63108	314-567-8
Name of Process Server	Address	Teleph
Name of Process Server	Address	Teleph
Name of Process Server	Address	Teleph
to serve the summons and petition in the		reiepi
to corve the commence and potition in the	no cados en me bolom named partico.	
SERVE: CENTAUR BUILDING SERVICES, INC.	SERVE:	
Name 4401 Ridgewood Avenue	Name	
Address ST. LOUIS, MO 63116	Address	
City/State/Zip	City/State/Zip	
SERVE:	SERVE:	
Name	Name	
Address	Address	
City/State/Zip	City/State/Zip	
Appointed as requested:		
TOM KLOEPPINGER, Circuit Clerk	MARY ANNE SEDEY	
·	Attorney/Plaintiff/Petitioner 26731	
By	Bar No. 2711 CLIFTON AVE. ST. LOU	IS MO 631
Deputy Clerk	Address 314-773-3566	.5,5 0010
Date	Phone No.	

RULE 14 SPECIAL PROCESS SERVERS

- 1. Any person appointed by the Court or the Circuit Clerk to serve process must have a license issued pursuant to this rule to serve process.
- 2. Licenses to serve process shall be issued by the Sheriff of the City of St. Louis if the applicant has met the following qualifications:
 - a. Is twenty-one years of age or older;
 - b. Has a high school diploma or an equivalent level of education;
 - c. Has insurance coverage for any errors or omissions occurring in the service of process;
 - d. Has not been convicted, pleaded guilty to or been found guilty of any felony, or of any misdemeanor involving moral turpitude; and,
 - e. Has passed a training course for the service of process which shall be administered by the Sheriff of the City of St. Louis.
- 3. Each applicant for a process server license under the provisions of this rule shall provide an affidavit setting forth such person's legal name, current address, any other occupations and current telephone numbers. Licensed process servers shall immediately notify the Sheriff of the City of St. Louis of any change in the above information, and the failure to do so shall constitute good cause for the revocation of such person's license.
- 4. The Sheriff of the City of St. Louis shall maintain a list of persons licensed to serve process pursuant to this rule, and shall make such list available to litigants upon request.
- 5. A photo identification card designed by the Sheriff of the City of St. Louis shall be issued in addition to the license. No other identification will be allowed. All licenses must be signed and approved by the Sheriff of the City of St. Louis and the Presiding Judge or his designee.
- 6. A license fee recommended by the Sheriff and approved by the Court En Banc shall be charged to cover the costs of compiling and maintaining the list of process servers and for the training of such process servers. The license fees shall be made payable to the Sheriff of the City of St. Louis.

- 7. A license for service of process issued under this rule may be revoked by the Sheriff with the approval of the Presiding Judge or his designee, for any of the following reasons:
 - a. Misrepresentation of duty or authority;
 - b. Conviction, guilty plea or finding of guilty of any state or federal felony, or a misdemeanor involving moral turpitude;
 - c. Improper use of the license;
 - d. Making a false return; or
 - e. Any other good cause.

Provided, no service of process made by an appointed process server with a revoked license shall be void if the Court or Circuit Clerk made the appointment in good faith without knowledge of the license revocation.

- 8. Any person authorized to serve process may carry a concealed firearm as allowed by Section 506.145, RSMo, only while actually engaged in the service of process and only if the person has passed a firearms qualification test approved by a law enforcement agency; provided, however, that any licensed special process server may file a written waiver of the right to carry a concealed firearm and thereby avoid the requirements of firearm training and testing. Any violation of this section shall be considered beyond the scope of the privilege to carry a concealed weapon that is granted by the appointment, and shall constitute good cause for the revocation of the license.
- 9. Applications for the appointment of a special process server shall be made on forms available in the offices of the Sheriff and Circuit Clerk. Orders Appointing special process servers may list more than one licensed server as alternatives.
- 10. The licenses granted pursuant to this rule shall be good for two years. Each person granted a license shall be required to reapply at the expiration of the license and shall be required to provide all the information required in the initial application, including a current police record check.

(Approved 9/28/92; amended 11/23/92; 5/31/95; 12/17/07)

In the CIRCUIT COURT City of St. Louis. Missouri



For File Stamp Only

2122-CC00246

,,	Manual Cours City and Course City and City and Course City and	
JAYNE SALERNO	CONS CONSTITUTE	
Plaintiff/Petitioner	2/1/2021	
	Date	
vs.	EF22351350	
CENTAUR BUILDING SERVICES, INC.	Case number	
Defendant/Respondent		
·	Division	

REQUEST FOR APPOINTMENT OF PROCESS SERVER
AS NOW JAYNE SALERNO

Comes now		, pursuam
Requ	esting Party	-
to Local Rule 14, requests the appointme	ent by the Circuit Clerk of	
WILLIAM STAGE	PO BOX 4932, ST. LOUIS MO 63108	314-567-8697
Name of Process Server	Address	Telephone
Name of Process Server	Address	Telephone
Name of Process Server	Address	Telephone
to serve the summons and petition in this	s cause on the below named parties.	
SERVE: CENTAUR BUILDING SERVICES, INC.	SERVE:	
Name 4401 Ridgewood Avenue	Name	
Address ST. LOUIS, MO 63116	Address	
City/State/Zip	City/State/Zip	
SERVE:	SERVE:	
Name	Name	
Address	Address	
City/State/Zip	City/State/Zip	
Appointed as requested:		
TOM KLOEPPINGER, Circuit Clerk	MARY ANNE SEDEY	
012	Attorney/Plaintiff/Petitioner 26731	
By Deputy Clerk	Bar No. 2711 CLIFTON AVE. ST. LOU	IIS, MO 63139
3-1-21	Address 314-773-3566	
Date	Phone No.	

Case: 4:21-cv-00284-JAR Doc. #: 1-1 Filed: 03/05/21 Page: 13 of 48 PageID #: 21



SPECIAL PROCESS SERVER

IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division:	Case Number: 2122-CC00246	Special Process Server 1
MICHAEL FRANCIS STELZER		. W STAGE
Plaintiff/Petitioner:	Plaintiff's/Petitioner's Attorney/Address	
JAYNE SALERNO	MARY ANNE OLWELL SEDEY	Special Process Server 2
	2711 CLIFTON AVE	·
VS	. ST LOUIS, MO 63139-2712	Special Process Server 3
Defendant/Respondent:	Court Address:	
CENTAUR BUILDING SERVICES, INC.	CIVIL COURTS BUILDING	
Nature of Suit:	10 N TUCKER BLVD	
CC Employmnt Discrmntn 213.111	SAINT LOUIS, MO 63101	(Date File Stamp)
Sı	ummons in Civil Case	
The State of Missouri to: CENTAUR BUILD	ING SERVICES , INC.	
Alias:		
C/O J FRED KOLB RAGT		
4401 RIDGEWOOD AVE		

SAINT LOUIS, MO 63116 **COURT SEAL OF**

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons,

exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition. **February 1, 2021** CITY OF ST LOUIS Date Further Information: Sheriff's or Server's Return Note to serving officer: Summons should be returned to the court within 30 days after the date of issue. I certify that I have served the above summons by: (check one) delivering a copy of the summons and a copy of the petition to the defendant/respondent. ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the defendant/respondent with , a person of the defendant's/respondent's family over the age of a service on a corporation deliver. (for service on a corporation) delivering a copy of the summons and a copy of the complaint to: _____ (name) _____ ☐ other: _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time). Printed Name of Sheriff or Server Signature of Sheriff or Server Must be sworn before a notary public if not served by an authorized officer: Subscribed and sworn to before me on ___ _ (date). (Seal) My commission expires: _ Notary Public Sheriff's Fees, if applicable Non Est

Summons

Sheriff's Deputy Salary Supplemental Surcharge

Mileage

10.00 (_____ miles @ \$.____ per mile)

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



SPECIAL PROCESS SERVER

IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: MICHAEL FRANCIS STELZER	Case Number: 2122-CC00246	Special Process Server 1 W STAGE
Plaintiff/Petitioner: JAYNE SALERNO vs	Plaintiff's/Petitioner's Attorney/Address MARY ANNE OLWELL SEDEY 2711 CLIFTON AVE ST LOUIS, MO 63139-2712	Special Process Server 2 Special Process Server 3
Defendant/Respondent: CENTAUR BUILDING SERVICES, INC. Nature of Suit: CC Employmnt Discrmntn 213.111	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	(Date File Stamp)

Summons in Civil Case

The State of Missouri to:	CENTAUR BUILDING	SERVICES,	INC.
	Alias:		

C/O J FRED KOLB RAGT 4401 RIDGEWOOD AVE SAINT LOUIS, MO 63116 COURT SEAL OF



You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

3	be taken against you for the relie	demanded in the petition.
CITY OF ST LOUIS	February 1, 2021	Thomas Ploeppinger
	Date	Clerk
	Further Information:	
	Sheriff's or Serv	er's Return
Note to serving officer: S	summons should be returned to the court	within 30 days after the date of issue.
I certify that I have served	the above summons by: (check one)	
leaving a copy of the su	• •	a person of the defendant's/respondent's family over the age of
	ently resides with the defendant/responderation) delivering a copy of the summons a (name)	and a convior the combianitio.
[7] other:		
Served at <u>4401</u>	Ridgewood	57 LOUIS MO 631/(address) 10, on 2-2-2/ (date) at 1145 Allowy
in 57. 200	(Gounty /City of St. Louis), N	
W M. L. S	STAGE JR. #197	Will TAGE OR
- SPEGIAL PRO	of Sheriff of Server	Signature of Sheriff or Server
,	Must be sworn before a notary public If not	served by an authorized officer: (date).
	Subscribed and sworn to before me on _	(date).
(Seal)	My commission expires:	
	Date	Notary Public
Sheriff's Fees, If applicable		
Summons	\$	
Non Est	\$	
Sheriff's Deputy Salary		
Supplemental Surcharge	\$10.00	
Mileage	\$ (miles @ \$	per mile)
Total	\$	to defendent/respondent. For methods of service on all
A copy of the summons and	l a copy of the petition must be served on	each defendant/respondent. For methods of service on all

Civil Procedure Form No. 1; Rules 54.01 – 54.05, 54.13, and 54.20; 506.120 – 506.140, and 506.150 RSMo

classes of sults, see Supreme Court Rule 54.

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS STATE OF MISSOURI

JAYNE SALERNO)	
Plaintiff,) v.)	Case No. 2122-CC00246
CENTAUR BUILDING SERVICES, INC.,) ATALIAN GLOBAL SERVICES, INC.,)	JURY TRIAL DEMANDED
Defendants.	
Serve:	
Registered Agents (respectively):	
J. Fred Kolb	
4401 Ridgewood Avenue	
St. Louis, MO 63116)	
COGENCY GLOBAL, INC.	
9666 Olive Blvd., Suite 690	
St. Louis, MO 63132	

AMENDED PETITION DISCRIMINATION IN VIOLATION OF THE MISSOURI HUMAN RIGHTS ACT

Plaintiff Jayne Salerno brings her Amended Petition for her claim of age discrimination under the Missouri Human Rights Act to redress injuries done to her by Defendants Centaur Building Services, Inc. and Atalian Global Services, Inc. In support thereof, Plaintiff states:

PARTIES, JURISDICTION, AND VENUE

- 1. Plaintiff brings this action under the Missouri Human Rights Act, Mo. Rev. Stat. § 213.010 et seq., as amended ("MHRA").
- 2. Plaintiff Jayne Salerno is a citizen of the State of Missouri, currently residing in St. Louis, Missouri. Ms. Salerno's date of birth is XX-XX-1957, and at the time Defendants terminated her, she was 62 years old.

- 3. Defendant Centaur Building Services, Inc. is a corporation authorized to do business in Missouri with its headquarters located at 4401 Ridgewood Avenue in the City of St. Louis. Centaur Building Services, Inc. provides facility services, such as janitorial services, for commercial buildings.
- 4. Defendant Atalian Global Services, Inc. (hereinafter "Atalian") is a corporation authorized to do business in Missouri. Defendant Atalian owns Centaur Building Services, Inc.
- 5. Defendant Atalian is located and maintains its principal place of business at 417 Fifth Avenue, 9th Floor, New York, NY 10016.
- 6. At all relevant times, Plaintiff Salerno worked for Defendants in an office located at 4401 Ridgewood Avenue in the City of St. Louis.
 - 7. Defendant Atalian employs over 120,000 people.
- 8. The unlawful employment practices complained of herein were committed within the county of St. Louis City, Missouri. Jurisdiction and venue in this Court are, therefore, proper pursuant to Mo. Rev. Stat. § 231.111.
- 9. Defendants have more than six (6) employees and are, therefore, an employer within the meaning of the MHRA, Mo. Rev. Stat. § 213.010(7).
- 10. On May 14, 2020, Plaintiff filed a timely charge of age discrimination against Defendant with the Missouri Commission on Human Rights.
- 11. On November 13, 2020, the Missouri Commission on Human Rights issued to Plaintiff its Notice of Right to Sue, and this action was initiated within ninety days thereof.

FACTUAL ALLEGATIONS

12. Plaintiff Salerno worked for Atalian and Centaur Building Services as an Area Recruiter.

- 13. Ms. Salerno brought considerable experience to her role as Area Recruiter. At her hire, she had over twenty years of experience in Human Resources and full cycle recruiting.
- 14. Throughout her career, Plaintiff garnered solid performance reviews and consistent pay raises. She never received any written or verbal discipline. At all times, Plaintiff met Defendant's legitimate performance expectations.
- 15. Plaintiff was one of three Human Resources employees in the St. Louis office. The other two employees, Ms. Range and Ms. Harris, were in their thirties, had no previous experience in human resources, and were hired as administrative staff.
- 16. In 2017, upon information and belief, Defendant Atalian bought DefendantCentaur Building Services.
- 17. In the spring of 2019, Plaintiff's supervisor, Jaclyn Bovinett, severed her employment with Defendants.
 - 18. Defendants hired Dan Kosinski as Plaintiff's new supervisor.
- 19. Upon information and belief, Kosinski is in his early thirties and over thirty years younger than Plaintiff.
- 20. Kosinski supervised Plaintiff and five other recruiters. The group had a weekly conference call regarding recruitment efforts.
 - 21. Four of the five other recruiters are significantly younger than Plaintiff Salerno.
- 22. Around this time, Defendants changed their recruitment model. Previously, Plaintiff was responsible for recruiting, interviewing, and placing applicants for janitorial, or "facility services," positions.

- 23. At each site where Defendants provided facility services, an Operations Manager supervised Defendants' employees. An Operations Manager in Plaintiff's territory typically supervised about ten to twenty sites.
- 24. In the new model, Defendants required Operations Managers to interview potential new hires.
- 25. Kosinski asked Plaintiff to coordinate onsite interviews with Operations

 Managers and continue to recruit new hires, perform drug screens and background checks, issue
 uniforms, and assist new hires with online access.
- 26. To prepare the Operations Managers, Plaintiff held at least six interview training sessions for Operations Managers in her territory.
- 27. Plaintiff's workload differed compared to the other recruiters. Plaintiff's territory contained more sites with smaller number of janitorial staff. She recruited for more than 100 sites. Other Area Recruiters worked with bigger sites with large numbers of janitorial staff. It was easier for other Area Recruiters to schedule group interviews with Operations Managers.
- 28. Additionally, whereas other Area Recruiters managed openings of 3-19 positions per week, Plaintiff consistently recruited for 11-30 positions every week.
- 29. Plaintiff adapted well to the new recruitment model, even though she had a higher workload than other Area Recruiters. Mr. Kosinski never critiqued her work performance and gave her positive feedback on the group conference calls.
- 30. Despite her success, on November 14, 2019, Defendants terminated Plaintiff without warning.

- 31. Arron Rhodes, Regional Human Resources Manager, met with Plaintiff on November 14, 2019. Mr. Rhodes is in his thirties and approximately thirty years younger than Plaintiff.
- 32. Douglas Comerio, Executive Vice President of the Midwest Region, was also present in the termination meeting. Mr. Comerio is about forty years old and approximately twenty years younger than Plaintiff.
- 33. Mr. Rhodes told Plaintiff that Defendants were terminating her due to an organizational restructuring. He did not offer additional details.
 - 34. Additionally, Mr. Rhodes did not offer Plaintiff a different position.
- 35. Plaintiff felt shocked. She was committed to her career and had never received negative feedback about her work performance.
- 36. A few weeks later, Defendants posted an advertisement seeking applications for Plaintiff's previous position.
- 37. Upon information and belief, Defendants hired Ashley Lane, a woman in her twenties, to replace Plaintiff.
 - 38. Defendants' termination of Plaintiff constitutes age discrimination.
- 39. In violation of the MHRA, Plaintiff's age motivated Defendants' decision to terminate Plaintiff.
- 40. Defendants, by their actions and failures to act, including but not limited to those described above, discriminated against Plaintiff on the basis of age in violation of the MHRA.
- 41. As a result of Defendants' actions and failures to act described herein, Plaintiff suffered emotional pain, distress humiliation, inconvenience, mental anguish and loss of enjoyment of life.

- 42. As a result of Defendants' conduct and the actions alleged herein, Plaintiff has suffered and will continue to suffer lost wages and benefits of employment.
- 43. As a result of Defendants' conduct and the actions alleged herein, Plaintiff has incurred and will continue to incur attorneys' fees, costs and expenses of suit.

WHEREFORE, Plaintiff prays that this Court will, after trial by jury, enter judgment in her favor and against Defendants and, in amounts to be determined at trial, for actual damages, including past and future lost income, compensatory damages, punitive damages, prejudgment interest, and attorneys' fees and costs of suit, and for such other relief as justice requires.

SEDEY HARPER WESTHOFF, P.C. Attorneys for Plaintiff

/s/ Mary Anne Sedey

Claire Bruner-Wiltse #69434
Mary Anne Sedey #26731
2711 Clifton Avenue
St. Louis, MO 63139
314/773-3566
314/773-3615 (fax)
cbruner-wiltse@sedeyharper.com
msedey@sedeyharper.com

Case: 4:21-cv-00284-JAR Doc. #: 1-1 Filed: 03/05/21 Page: 21 of 48 PageID #: 29



IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

/ (Second)		·		
Judge or Division:		Case Number: 2122-CC00246		
MICHAEL FRANCIS STEL	7FR			
Plaintiff/Petitioner:	<u> </u>	Plaintiff's/Petitioner's Attorney/Ad	dress	W STAGE
JAYNE SALERNO		MARY ANNE OLWELL SEDEY	I G G G G	SPECIAL PROCESS
JATTIL GALLINIO		2711 CLIFTON AVE		SERVER
	VS.	ST LOUIS, MO 63139-2712		
Defendant/Respondent:		Court Address:		
CENTAUR BUILDING SE	RVICES , INC.	CIVIL COURTS BUILDING		
Nature of Suit:		10 N TUCKER BLVD		
CC Employmnt Discrmntn	213.111	SAINT LOUIS, MO 63101		(Date File Stamp)
	Sur	mmons in Civil Case		
The State of Missouri to	: COGENCY GLOBA	L, INC.		
	Alias:			
9666 OLIVE BLVD. SUITE 690				
SAINT LOUIS, MO 63132			SPECIALI	PROCESS SERVER
·				
COURT SEAL OF		d to appear before this court and		
OURTO		tached, and to serve a copy of y		
(3)		at the above address all within 3		
		y of service. If you fail to file you for the relief demanded in the		agment by default may
The control of the co	be taken against yo			•
CITY OF ST LOUIS	February 4, 20	21	Romas Kloey	Struder
	Date		Clerk	
	Further Information:			
	_	eriff's or Server's Return		
_		rned to the court within 30 days after th	ne date of issue.	
<u> </u>	d the above summons by:			
		the petition to the defendant/responders the petition at the dwelling place or usual		efendant/respondent with
ieaving a copy of the s	summons and a copy of the	, a person of the defend	dant's/responden	t's family over the age of
	nently resides with the def	fendant/respondent.		, ,
		of the summons and a copy of the com		/4:41 - \
		(name)		(title).
Served at				(address)
in	(County/Cit	y of St. Louis), MO, on	(date	e) at (time).
Printed Nam	e of Sheriff or Server Must be sworn before a no	otary public if not served by an authorize	Signature of Shered officer:	iff or Server
	Subscribed and sworn to	before me on	(date).
(Seal)				
	My commission expires:	Date	Notar	y Public
Sheriff's Fees, if applicab	<u></u>	Date	110141	y 1 dollo
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Non Est	\$			
Sheriff's Deputy Salary				
Supplemental Surcharge	\$			
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Total	\$			
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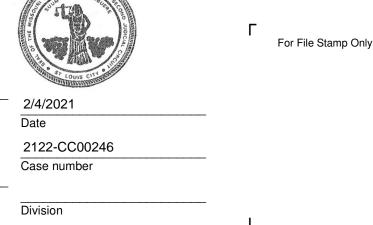
classes of suits, see Supreme Court Rule 54.

In the CIRCUIT COURT City of St. Louis, Missouri

JAYNE SALERNO

Plaintiff/Petitioner

vs.



CENTAUR BUILDING SERVICES, INC. Defendant/Respondent REQUEST FOR APPOINTMENT OF PROCESS SERVER Comes now JAYNE SALERNO pursuant Requesting Party to Local Rule 14, requests the appointment by the Circuit Clerk of WILLIAM STAGE PO BOX 4932, ST. LOUIS MO 63108 314-567-8697 Name of Process Server Telephone Address Name of Process Server Telephone Name of Process Server Address Telephone to serve the summons and petition in this cause on the below named parties. SERVE: ATALIAN GLOBAL SERVICES, INC. SERVE: CENTAUR BUILDING SERVICES, INC. Name 4401 Ridgewood Avenue 9666 Olive Blvd., Suite 690 Address St. Louis, MO 63132 Address ST. LOUIS, MO 63116 City/State/Zip City/State/Zip SERVE: SERVE: Name Name Address Address City/State/Zip City/State/Zip Appointed as requested: MARY ANNE SEDEY TOM KLOEPPINGER, Circuit Clerk Attorney/Plaintiff/Petitioner 26731 Bar No. 2711 CLIFTON AVE. ST. LOUIS, MO 63139 Deputy Clerk Address 314-773-3566 Date Phone No.

RULE 14 SPECIAL PROCESS SERVERS

- 1. Any person appointed by the Court or the Circuit Clerk to serve process must have a license issued pursuant to this rule to serve process.
- 2. Licenses to serve process shall be issued by the Sheriff of the City of St. Louis if the applicant has met the following qualifications:
 - a. Is twenty-one years of age or older;
 - b. Has a high school diploma or an equivalent level of education;
 - c. Has insurance coverage for any errors or omissions occurring in the service of process;
 - d. Has not been convicted, pleaded guilty to or been found guilty of any felony, or of any misdemeanor involving moral turpitude; and,
 - e. Has passed a training course for the service of process which shall be administered by the Sheriff of the City of St. Louis.
- 3. Each applicant for a process server license under the provisions of this rule shall provide an affidavit setting forth such person's legal name, current address, any other occupations and current telephone numbers. Licensed process servers shall immediately notify the Sheriff of the City of St. Louis of any change in the above information, and the failure to do so shall constitute good cause for the revocation of such person's license.
- 4. The Sheriff of the City of St. Louis shall maintain a list of persons licensed to serve process pursuant to this rule, and shall make such list available to litigants upon request.
- 5. A photo identification card designed by the Sheriff of the City of St. Louis shall be issued in addition to the license. No other identification will be allowed. All licenses must be signed and approved by the Sheriff of the City of St. Louis and the Presiding Judge or his designee.
- 6. A license fee recommended by the Sheriff and approved by the Court En Banc shall be charged to cover the costs of compiling and maintaining the list of process servers and for the training of such process servers. The license fees shall be made payable to the Sheriff of the City of St. Louis.

- 7. A license for service of process issued under this rule may be revoked by the Sheriff with the approval of the Presiding Judge or his designee, for any of the following reasons:
 - a. Misrepresentation of duty or authority;
 - b. Conviction, guilty plea or finding of guilty of any state or federal felony, or a misdemeanor involving moral turpitude;
 - c. Improper use of the license;
 - d. Making a false return; or
 - e. Any other good cause.

Provided, no service of process made by an appointed process server with a revoked license shall be void if the Court or Circuit Clerk made the appointment in good faith without knowledge of the license revocation.

- 8. Any person authorized to serve process may carry a concealed firearm as allowed by Section 506.145, RSMo, only while actually engaged in the service of process and only if the person has passed a firearms qualification test approved by a law enforcement agency; provided, however, that any licensed special process server may file a written waiver of the right to carry a concealed firearm and thereby avoid the requirements of firearm training and testing. Any violation of this section shall be considered beyond the scope of the privilege to carry a concealed weapon that is granted by the appointment, and shall constitute good cause for the revocation of the license.
- 9. Applications for the appointment of a special process server shall be made on forms available in the offices of the Sheriff and Circuit Clerk. Orders Appointing special process servers may list more than one licensed server as alternatives.
- 10. The licenses granted pursuant to this rule shall be good for two years. Each person granted a license shall be required to reapply at the expiration of the license and shall be required to provide all the information required in the initial application, including a current police record check.

(Approved 9/28/92; amended 11/23/92; 5/31/95; 12/17/07)

In the CIRCUIT COURT City of St. Louis, Missouri



For File Stamp Only

,	tours city
JAYNE SALERNO	
Plaintiff/Petitioner	2/4/2021
Tantan oddono.	Date
· /S.	2122-CC00246
CENTAUR BUILDING SERVICES, INC.	Case number
Defendant/Respondent	Division

REQUEST FOR APPOINTM	MENT OF PROCESS SERV	
Comes now JAYNE SALERNO		, pursuant
Reques	ting Party	
to Local Rule 14, requests the appointmen WILLIAM STAGE	PO BOX 4932, ST. LOUIS MO 63108	314-567-8697
Name of Process Server	Address	Telephone
Name of Process Server	Address	Telephone
Name of Process Server	Address	Telephone
to serve the summons and petition in this of		·
to serve the summons and position in this	,	
SERVE: CENTAUR BUILDING SERVICES, INC.	SERVE: ATALIAN GLOBAL SERVICE:	S, INC
Name 4401 Ridgewood Avenue	Name 9666 Olive Blvd., Suite 690	
Address ST. LOUIS, MO 63116	Address St. Louis, MO 63132	
City/State/Zip	City/State/Zip	
SERVE:	SERVE:	
Name	Name	
Address	Address	
City/State/Zip	City/State/Zip	
A		
Appointed as requested: TOM KLOEPPINGER, Circuit Clerk	MARY ANNE SEDEY	
TOM REGERFINGER, Credit Gigity	Attorney/Plaintiff/Petitioner 26731	
By // // // // // // // // // //	Bar No. 2711 CLIFTON AVE. ST. LOU	IIS MO 63139
Deputy Cherk	Address 314-773-3566	710, WO 00 100
Date	Phone No.	

Case: 4:21-cv-00284-JAR Doc. #: 1-1 Filed: 03/05/21 Page: 26 of 48 PageID #: 34

Case Number: 2122-CC00246



Judge or Division:

IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

MICHAEL FRANCIS STELZER			
Plaintiff/Petitioner:	Plaintiff's/Petitioner's Attorney/Address		W STAGE
JAYNE SALERNO	MARY ANNE OLWELL SEDEY		SPECIAL PROCESS SERVER
	2711 CLIFTON AVE		JLIVLIV
VS.			
Defendant/Respondent:	Court Address: CIVIL COURTS BUILDING		
CENTAUR BUILDING SERVICES , INC.	10 N TUCKER BLVD		
Nature of Suit:	SAINT LOUIS, MO 63101		(Date File Stamp)
CC Employmnt Discrmntn 213.111			(Date File Staffp)
	immons in Civil Case		
The State of Missouri to: CENTAUR BUILD	NG SERVICES , INC.		
Alias:	ſ		
C/O J FRED KOLB RAGT 4401 RIDGEWOOD AVE		SDECIM	PROCESS SERVER
SAINT LOUIS, MO 63116		SPECIAL	FROOLOGOERVER
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COURT SEAL OF You are summon	attached, and to serve a copy of y	our pleading	upon the attorney for
nlaintiff/netitione	r at the above address all within 3	0 davs after re	eceiving this summons,
exclusive of the c	lay of service. If you fail to file you	ır pleading, ju	dgment by default may
be taken against	you for the relief demanded in the	petition.	- '
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CITY OF ST LOUIS February 4, 2	021	Romas Kloep	gunger
Date	<u> </u>	Clerk	
Further Information:			
	Sheriff's or Server's Return		
Note to serving officer: Summons should be re	urned to the court within 30 days after th	ne date of issue.	
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leaving a copy of the summons and a copy of	the petition at the dwelling place or usua	ai abode oi the d dant's/responde	nt's family over the age of
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in(County/0	City of St. Louis), MO, on	(uat	e) at (time).
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	to before me on		(date).
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My commission expire	S: Date	Nota	ary Public
OL 100 E 16	Date		·
Sheriff's Fees, if applicable Summons \$			
Non Est \$			
Sheriff's Deputy Salary			
Supplemental Surcharge \$10.00			
Mileage \$	miles @ \$ per mile)		

classes of suits, see Supreme Court Rule 54.

Total

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all



IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division: MICHAEL FRANCIS STELZER	Case Number: 2122-CC00246	
Plaintiff/Petitioner: JAYNE SALERNO	Plaintiff's/Petitioner's Attorney/Address MARY ANNE OLWELL SEDEY 2711 CLIFTON AVE ST LOUIS, MO 63139-2712	W STAGE SPECIAL PROCESS SERVER
Defendant/Respondent: CENTAUR BUILDING SERVICES, INC. Nature of Suit: CC Employmnt Discrement 213.111	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	(Date File Stamp)

Nature of Suit: CC Employmnt Discrmntn 2	213 111	SAINT LOUIS, MO 63	3101	(Date File Stamp)
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The State of Missouri to				
	Alias:		<u> </u>	
C/O COGENCY GLOBAL INC 9666 OLIVE BLVD SUITE 690 SAINT LOUIS, MO 63132			a segui magan magan segui	PROCESS SERVER
COURT SEAL OF	copy of which is a plaintiff/petitioner exclusive of the da be taken against y	ttached, and to serve a at the above address a ay of service. If you fai ou for the relief demar	a copy of your pleading all within 30 days after r I to file your pleading, ju aded in the petition.	eceiving this summons, udgment by default may
CITY OF ST LOUIS	February 4, 20)21	Thomas Moe	njunger
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A copy of the summons an classes of suits, see Supre	me Court Rule 54.	idat be actived on caon de		

Case Number: 2122-CC00246



IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

MICHAEL FRANCIS STEL	ZER			·
Plaintiff/Petitioner:		Plaintiff's/Petitioner's Attorney/Add	dress	W STAGE
JAYNE SALERNO		MARY ANNE OLWELL SEDEY		SPECIAL PROCESS SERVER
		2711 CLIFTON AVE		SERVER
	VS	ST LOUIS, MO 63139-2712		
Defendant/Respondent:		Court Address:		
CENTAUR BUILDING SE	RVICES , INC.	CIVIL COURTS BUILDING 10 N TUCKER BLVD		
Nature of Suit:		SAINT LOUIS, MO 63101		· · · · · · · · · · · · · · · · · · ·
CC Employmnt Discrmntn				(Date File Stamp)
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The State of Missouri to	: CENTAUR BUILDIN	IG SERVICES , INC.		
	Alias:			
C/O J FRED KOLB RAGT	•			
4401 RIDGEWOOD AVE SAINT LOUIS, MO 63116			SPECIAL	PROCESS SERVER
		Ļ		
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COURTO	copy of which is at	tached, and to serve a copy of y	our pleading	upon the attorney for
	plaintiff/petitioner	at the above address all within 3	υ days aπer re	demont by default may
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	February 4, 20	121 プ	Romas Kloep	yringer
CITY OF ST LOUIS				0
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	TAGE JR. *#/	97 When	C Page	a OR
SPECIAL PROC	ESS SERVER		Signature of She	eriff or Server
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Non Est	\$			
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1 of 1

OSCA (06-18) SM30 (SMCC) For Court Use Only: Document Id # 21-SMCC-866

classes of suits, see Supreme Court Rule 54.

Civil Procedure Form No. 1; Rules 54.01-54.05, 54.13, and 54.20; 506.120-506.140, and 506.150 RSMo



IN THE 22ND JUDICIAL CIRCUIT, CITY OF ST LOUIS, MISSOURI

Judge or Division:	Case Number: 2122-CC00246	
MICHAEL FRANCIS STELZER		
Plaintiff/Petitioner:	Plaintiff's/Petitioner's Attorney/Address	W STAGE
JAYNE SALERNO	MARY ANNE OLWELL SEDEY	SPECIAL PROCESS SERVER
vs.	2711 CLIFTON AVE ST LOUIS, MO 63139-2712	
Defendant/Respondent: CENTAUR BUILDING SERVICES , INC.	Court Address: CIVIL COURTS BUILDING	
Nature of Suit: CC Employmnt Discrente 213.111	10 N TUCKER BLVD SAINT LOUIS, MO 63101	(Date File Stamp)

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COURT SEAL OF	copy of which is a plaintiff/petitioner exclusive of the da be taken against y	ttached, and to servat the above address ay of service. If you ou for the relief der	ve a copy of your seall within 30 fail to file you manded in the	our pleading 0 days after r ir pleading, ju petition.	pleading to the petition, a upon the attorney for eceiving this summons, adgment by default may
CITY OF ST LOUIS	February 4, 20)21		Romas Kloe	Marger
	Date			Clerk	
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A conv of the summons and	a copy of the petition m	oust be served on each	defendant/resp	ondent. For me	thods of service on all
classes of suits, see Suprer	ne Court Rule 54.				

1 of 1

OSCA (06-18) SM30 (SMCC) For Court Use Only: Document ld # 21-SMCC-867

Civil Procedure Form No. 1; Rules 54.01 – 54.05, 54.13, and 54.20; 506.120 – 506.140, and 506.150 RSMo

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS STATE OF MISSOURI

JAYNE SALERNO)	
Plaintiff,)	C N- 2122 CC00246
v.)	Case No. 2122-CC00246
CENTAUR BUILDING SERVICES, INC.,	JURY TRIAL DEMANDED
ATALIAN US SHARED SERVICES, LLC,)	
and ATALIAN US MIDWEST, LLC,	
Defendants.	
Serve:	
Registered Agents:	
J. Fred Kolb (CENTAUR)	
4401 Ridgewood Avenue	
St. Louis, MO 63116	
CT CORPORATION SYSTEM)	
(ATALIAN US SHARED SERVICES)	
120 South Central Ave	
Clayton, MO 63105	
CT CORPORATION SYSTEM)	
(ATALIAN US MIDWEST, LCC)	
120 South Central Ave	
Clayton, MO 63105	

SECOND AMENDED PETITION DISCRIMINATION IN VIOLATION OF THE MISSOURI HUMAN RIGHTS ACT

Plaintiff Jayne Salerno brings her Second Amended Petition for her claim of age discrimination under the Missouri Human Rights Act to redress injuries done to her by Defendants Centaur Building Services, Inc., Atalian US Shared Services, LLC, and Atalian US Midwest, LLC, d/b/a/Atalian Global Services, Inc. In support thereof, Plaintiff states:

PARTIES, JURISDICTION, AND VENUE

- 1. Plaintiff brings this action under the Missouri Human Rights Act, Mo. Rev. Stat. § 213.010 et seq., as amended ("MHRA").
- 2. Plaintiff Jayne Salerno is a citizen of the State of Missouri, currently residing in St. Louis, Missouri. Ms. Salerno's date of birth is XX-XX-1957, and at the time Defendants terminated her, she was 62 years old.
- 3. Defendant Centaur Building Services, Inc. is a corporation authorized to do business in Missouri with its headquarters located at 4401 Ridgewood Avenue in the City of St. Louis. Centaur Building Services, Inc. provides facility services, such as janitorial services, for commercial buildings.
- 4. Defendant Atalian US Shared Services, LLC (hereinafter "Atalian USS,") is a limited liability company authorized to do business in Missouri. Defendant Atalian USS owns Centaur Building Services, Inc.
- 5. Defendant Atalian US Midwest, LLC (hereinafter "Atalian Midwest,") is a limited liability company authorized to do business in Missouri. Defendant Atalian Midwest owns Centaur Building Services, Inc.
- 6. Defendants Centaur Building Services, Inc., Atalian US Shared Services, LLC, and Atalian US Midwest, LLC, also do business under the name "Atalian Global Services, Inc."
- 7. At all relevant times, Plaintiff Salerno worked for Defendants in an office located at 4401 Ridgewood Avenue in the City of St. Louis.
- 8. The unlawful employment practices complained of herein were committed within the county of St. Louis City, Missouri. Jurisdiction and venue in this Court are, therefore, proper pursuant to Mo. Rev. Stat. § 231.111.

- 9. Defendants have more than six (6) employees and are, therefore, an employer within the meaning of the MHRA, Mo. Rev. Stat. § 213.010(7).
- 10. On May 14, 2020, Plaintiff filed a timely charge of age discrimination against Defendant with the Missouri Commission on Human Rights.
- 11. On November 13, 2020, the Missouri Commission on Human Rights issued to Plaintiff its Notice of Right to Sue, and this action was initiated within ninety days thereof.

FACTUAL ALLEGATIONS

- 12. Plaintiff Salerno worked for Defendants as an Area Recruiter.
- 13. Ms. Salerno brought considerable experience to her role as Area Recruiter. At her hire, she had over twenty years of experience in Human Resources and full cycle recruiting.
- 14. Throughout her career, Plaintiff garnered solid performance reviews and consistent pay raises. She never received any written or verbal discipline. At all times, Plaintiff met Defendant's legitimate performance expectations.
- 15. Plaintiff was one of three Human Resources employees in the St. Louis office. The other two employees, Ms. Range and Ms. Harris, were in their thirties, had no previous experience in human resources, and were hired as administrative staff.
- 16. In 2017, upon information and belief, Defendant Atalian USS and Defendant Atalian Midwest bought Defendant Centaur Building Services.
- 17. In the spring of 2019, Plaintiff's supervisor, Jaclyn Bovinett, severed her employment with Defendants.
 - 18. Defendants hired Dan Kosinski as Plaintiff's new supervisor.
- 19. Upon information and belief, Kosinski is in his early thirties and over thirty years younger than Plaintiff.

- 20. Kosinski supervised Plaintiff and five other recruiters. The group had a weekly conference call regarding recruitment efforts.
 - 21. Four of the five other recruiters are significantly younger than Plaintiff Salerno.
- 22. Around this time, Defendants changed their recruitment model. Previously, Plaintiff was responsible for recruiting, interviewing, and placing applicants for janitorial, or "facility services," positions.
- 23. At each site where Defendants provided facility services, an Operations Manager supervised Defendants' employees. An Operations Manager in Plaintiff's territory typically supervised about ten to twenty sites.
- 24. In the new model, Defendants required Operations Managers to interview potential new hires.
- 25. Kosinski asked Plaintiff to coordinate onsite interviews with Operations

 Managers and continue to recruit new hires, perform drug screens and background checks, issue
 uniforms, and assist new hires with online access.
- 26. To prepare the Operations Managers, Plaintiff held at least six interview training sessions for Operations Managers in her territory.
- 27. Plaintiff's workload differed compared to the other recruiters. Plaintiff's territory contained more sites with smaller number of janitorial staff. She recruited for more than 100 sites. Other Area Recruiters worked with bigger sites with large numbers of janitorial staff. It was easier for other Area Recruiters to schedule group interviews with Operations Managers.
- 28. Additionally, whereas other Area Recruiters managed openings of 3-19 positions per week, Plaintiff consistently recruited for 11-30 positions every week.

- 29. Plaintiff adapted well to the new recruitment model, even though she had a higher workload than other Area Recruiters. Mr. Kosinski never critiqued her work performance and gave her positive feedback on the group conference calls.
- 30. Despite her success, on November 14, 2019, Defendants terminated Plaintiff without warning.
- 31. Arron Rhodes, Regional Human Resources Manager, met with Plaintiff on November 14, 2019. Mr. Rhodes is in his thirties and approximately thirty years younger than Plaintiff.
- 32. Douglas Comerio, Executive Vice President of the Midwest Region, was also present in the termination meeting. Mr. Comerio is about forty years old and approximately twenty years younger than Plaintiff.
- 33. Mr. Rhodes told Plaintiff that Defendants were terminating her due to an organizational restructuring. He did not offer additional details.
 - 34. Additionally, Mr. Rhodes did not offer Plaintiff a different position.
- 35. Plaintiff felt shocked. She was committed to her career and had never received negative feedback about her work performance.
- 36. A few weeks later, Defendants posted an advertisement seeking applications for Plaintiff's previous position.
- 37. Upon information and belief, Defendants hired Ashley Lane, a woman in her twenties, to replace Plaintiff.
 - 38. Defendants' termination of Plaintiff constitutes age discrimination.
- 39. In violation of the MHRA, Plaintiff's age motivated Defendants' decision to terminate Plaintiff.

- 40. Defendants, by their actions and failures to act, including but not limited to those described above, discriminated against Plaintiff on the basis of age in violation of the MHRA.
- 41. As a result of Defendants' actions and failures to act described herein, Plaintiff suffered emotional pain, distress humiliation, inconvenience, mental anguish and loss of enjoyment of life.
- 42. As a result of Defendants' conduct and the actions alleged herein, Plaintiff has suffered and will continue to suffer lost wages and benefits of employment.
- 43. As a result of Defendants' conduct and the actions alleged herein, Plaintiff has incurred and will continue to incur attorneys' fees, costs and expenses of suit.

WHEREFORE, Plaintiff prays that this Court will, after trial by jury, enter judgment in her favor and against Defendants and, in amounts to be determined at trial, for actual damages, including past and future lost income, compensatory damages, punitive damages, prejudgment interest, and attorneys' fees and costs of suit, and for such other relief as justice requires.

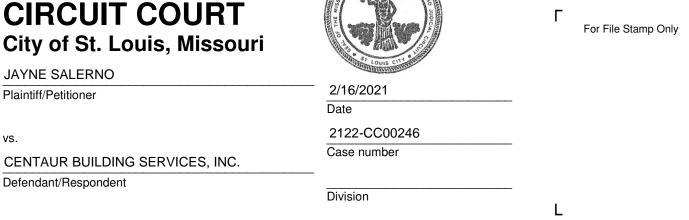
SEDEY HARPER WESTHOFF, P.C. Attorneys for Plaintiff

/s/ Mary Anne Sedey

Claire Bruner-Wiltse #69434 Mary Anne Sedey #26731 2711 Clifton Avenue St. Louis, MO 63139 314/773-3566 314/773-3615 (fax) cbruner-wiltse@sedeyharper.com msedey@sedeyharper.com

In the **CIRCUIT COURT** City of St. Louis, Missouri

vs.



REQUEST FOR	<u>APPOINTMENT</u>	OF PROCESS	SERVER

Comes now JATINE SALERING		, pursuant
	uesting Party	·
to Local Rule 14, requests the appointm	ent by the Circuit Clerk of	
WILLIAM STAGE	PO BOX 4932, ST. LOUIS MO 63108	314-567-8697
Name of Process Server	Address	Telephone
Name of Process Server	Address	Telephone
Name of Process Server	Address	Telephone
to serve the summons and petition in the	is cause on the below named parties.	
SERVE: J. Fred Kolb (CENTAUR)	SERVE: CT CORPORATION SERVICE	≣S
Name 4401 Ridgewood Avenue	Name 120 South Central Ave	
Address ST. LOUIS, MO 63116	Address St. Louis, MO 63105	
City/State/Zip	City/State/Zip	
SERVE: CT CORPORATION SERVICES	SERVE:	
Name 120 South Central Ave.	Name	
Address St. Louis, MO 63105	Address	
City/State/Zip	City/State/Zip	
Appointed as requested:		
TOM KLOEPPINGER, Circuit Clerk	MARY ANNE SEDEY	
,	Attorney/Plaintiff/Petitioner 26731	
By	Bar No. 2711 CLIFTON AVE. ST. LOU	IIS, MO 63139
	Address 314-773-3566	
Date	Phone No.	

RULE 14 SPECIAL PROCESS SERVERS

- 1. Any person appointed by the Court or the Circuit Clerk to serve process must have a license issued pursuant to this rule to serve process.
- 2. Licenses to serve process shall be issued by the Sheriff of the City of St. Louis if the applicant has met the following qualifications:
 - a. Is twenty-one years of age or older;
 - b. Has a high school diploma or an equivalent level of education;
 - c. Has insurance coverage for any errors or omissions occurring in the service of process;
 - d. Has not been convicted, pleaded guilty to or been found guilty of any felony, or of any misdemeanor involving moral turpitude; and,
 - e. Has passed a training course for the service of process which shall be administered by the Sheriff of the City of St. Louis.
- 3. Each applicant for a process server license under the provisions of this rule shall provide an affidavit setting forth such person's legal name, current address, any other occupations and current telephone numbers. Licensed process servers shall immediately notify the Sheriff of the City of St. Louis of any change in the above information, and the failure to do so shall constitute good cause for the revocation of such person's license.
- 4. The Sheriff of the City of St. Louis shall maintain a list of persons licensed to serve process pursuant to this rule, and shall make such list available to litigants upon request.
- 5. A photo identification card designed by the Sheriff of the City of St. Louis shall be issued in addition to the license. No other identification will be allowed. All licenses must be signed and approved by the Sheriff of the City of St. Louis and the Presiding Judge or his designee.
- 6. A license fee recommended by the Sheriff and approved by the Court En Banc shall be charged to cover the costs of compiling and maintaining the list of process servers and for the training of such process servers. The license fees shall be made payable to the Sheriff of the City of St. Louis.

- 7. A license for service of process issued under this rule may be revoked by the Sheriff with the approval of the Presiding Judge or his designee, for any of the following reasons:
 - a. Misrepresentation of duty or authority;
 - b. Conviction, guilty plea or finding of guilty of any state or federal felony, or a misdemeanor involving moral turpitude;
 - c. Improper use of the license;
 - d. Making a false return; or
 - e. Any other good cause.

Provided, no service of process made by an appointed process server with a revoked license shall be void if the Court or Circuit Clerk made the appointment in good faith without knowledge of the license revocation.

- 8. Any person authorized to serve process may carry a concealed firearm as allowed by Section 506.145, RSMo, only while actually engaged in the service of process and only if the person has passed a firearms qualification test approved by a law enforcement agency; provided, however, that any licensed special process server may file a written waiver of the right to carry a concealed firearm and thereby avoid the requirements of firearm training and testing. Any violation of this section shall be considered beyond the scope of the privilege to carry a concealed weapon that is granted by the appointment, and shall constitute good cause for the revocation of the license.
- 9. Applications for the appointment of a special process server shall be made on forms available in the offices of the Sheriff and Circuit Clerk. Orders Appointing special process servers may list more than one licensed server as alternatives.
- 10. The licenses granted pursuant to this rule shall be good for two years. Each person granted a license shall be required to reapply at the expiration of the license and shall be required to provide all the information required in the initial application, including a current police record check.

(Approved 9/28/92; amended 11/23/92; 5/31/95; 12/17/07)

In the **CIRCUIT COURT** City of St. Louis, Missouri

JAYNE SALERNO

Defendant/Respondent

Plaintiff/Petitioner

vs.



REQUEST FOR APPOINTMENT OF PROCESS SERVER

Comes now		, pursuant
	questing Party	
to Local Rule 14, requests the appointm		
WILLIAM STAGE	PO BOX 4932, ST. LOUIS MO 63108	314-567-8697
Name of Process Server	Address	Telephone
Name of Process Server	Address	Telephone
Name of Process Server	Address	Telephone
to serve the summons and petition in th	is cause on the below named parties.	
SERVE:	SERVE: CT CORPORATION SERVIC	EQ
J. Fred Kolb (CENTAUR)	Name	
Name 4401 Ridgewood Avenue	120 South Central Ave	
Address ST. LOUIS, MO 63116	Address St. Louis, MO 63105	
City/State/Zip	City/State/Zip	
SERVE: CT CORPORATION SERVICES	SERVE:	
Name 120 South Central Ave.	Name	
Address St. Louis, MO 63105	Address	
City/State/Zip	City/State/Zip	
Appointed as requested:		
TOM KLOEPPINGER, Circuit Clerk	MARY ANNE SEDEY	
	Attorney/Plaintiff/Petitioner 26731	
By	Bar No. 2711 CLIFTON AVE. ST. LOU	JIS, MO 63139
1 7 7 5	Address 314-773-3566	
Date	Phone No.	

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- 10. The licenses granted pursuant to this rule shall be good for two years. Each person granted a license shall be required to reapply at the expiration of the license and shall be required to provide all the information required in the initial application, including a current police record check.

(Approved 9/28/92; amended 11/23/92; 5/31/95; 12/17/07)

IN THE CIRCUIT COURT OF THE CITY OF ST. LOUIS STATE OF MISSOURI

JAYNE SALERNO)
Plaintiff, v.) Case No. 2122-CC00246
CENTAUR BUILDING SERVICES, INC., ATALIAN GLOBAL SERVICES, INC.,	JURY TRIAL DEMANDED)
Defendants.)))

PLAINTIFF'S MOTION FOR LEAVE TO FILE SECOND AMENDED PETITION

COMES NOW Plaintiff Jayne Salerno, by and through counsel, pursuant to Rule 55.33 (a), and files this Motion for Leave to File Plaintiff's Second Amended Petition. In support thereof, Plaintiff states:

- 1. On February 1, 2021, Plaintiff filed this age discrimination action under the Missouri Human Rights Act ("MHRA") Mo. Rev. Stat. § 213.111 *et seq.* naming as Defendant Centaur Building Services, Inc.
- 2. On February 4, 2021, Plaintiff filed an Amended Petition and added Atalian Global Services, Inc. as a Defendant, upon information and belief that Atalian Global Services, Inc. owns Centaur Building Services.
- 3. On its website, Atalian Global Services lists its Midwest Headquarters at 4401 Ridgewood Avenue, St. Louis, MO, 63116, which is the same location where Plaintiff worked. *See* "ATALIAN- Midwest Region," Atalian Global Services, February 17, 2021 at 1:10 PM, https://atalian.us/midwestregion/. It also states that "In 2017 Centaur was acquired by Atalian US and has continued the same dedicated service with the backing of our international supports." Id.

- 4. The Missouri Secretary of State website shows several entities using the name Atalian, but does not show definitively which of those entities actually owns Centaur Building Services.
- 5. When Plaintiff attempted to serve her Amended Petition on Atalian Global Services, Inc.'s registered agent, COGENCY GLOBAL, the registered agent, refused to accept service based on the fact that Atalian Global Services, Inc. was administratively discharged for failing to file a report with the State of Missouri.
- 7. Subsequently, Plaintiff's process server attempted to serve the Amended Petition on CT Corporation, the registered agent for both Atalian US Shared Services, LLC, and Atalian US Midwest, LLC. However, on February 12, 2021, Plaintiff received a letter that CT Corporation was not the registered agent for Atalian Global Services, Inc. and it was unable to forward Plaintiff's Amended Petition.
- 8. Despite the fact that Centaur Building Services continues to use the name Atalian Global Services, Inc., it appears that Atalian Global Services, Inc. is not the correct name of the entity that owns Centaur Building Services. Upon information and belief, it appears that Atalian US Shared Services, LLC, is the legal entity that owns Centaur Building Services, Inc.
- 9. Plaintiff seeks to amend her Petition to name Atalian US Shared Services, LLC as the correct Defendant.
- 8. Rule 55.33(a) states that a court may "freely give" leave to a party to file an amended pleading "when justice so requires."
- 9. Missouri Courts have held that there are five factors to consider in deciding whether to allow leave to amend a petition, namely, "(1) hardship to the moving party if leave is not granted; (2) reasons for failure to include any new matter in earlier pleadings; (3) timeliness

of the application; (4) whether an amendment could cure the inadequacy of the moving party's pleading; and (5) injustice resulting to the party opposing the motion, should it be granted."

<u>Dueker v. Gill</u>, 175 S.W.3d 662, 671 (Mo. Ct. App. 2005).

- amend her petition. First, Plaintiff will experience a hardship if the leave is not granted because she seeks to name the correct Defendant. Second, Plaintiff seeks to amend her Petition only to properly name Atalian US Shared Services, LLC as Defendant; she is not seeking to add new matters or allegations. Third, Plaintiff's application—less than three weeks after her initial filing—is timely. Fourth, the amendment will cure thee Plaintiff's inaccurately named Defendant. Finally, there would be no injustice resulting to any Defendant, as Plaintiff's Second Amended Petition will be filed so early in the litigation of her claims.
- 12. Here, justice requires that Plaintiff be granted leave to file a Second Amended Petition. It is often difficult for an employee to ascertain which legal entity owns a company. Granting leave to file Plaintiff's Second Amended Petition is a reasonable remedy to a reasonable misnomer.

WHEREFORE, for the foregoing reasons, Plaintiff respectfully requests that this Court grant this motion to file her Second Amended Petition, and grant Plaintiff such further relief as the Court deems just and proper.

SEDEY HARPER WESTHOFF, P.C. Attorneys for Plaintiff

/s/ Mary Anne Sedey

Mary Anne Sedey #26731 Claire Bruner-Wiltse #69434 2711 Clifton Avenue St. Louis, MO 63139 314/773-3566 314/773-3615 (fax) msedey@sedeyharper.com cbruner-wiltse@sedeyharper.com

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on February 19, 2021, the foregoing document was filed electronically with the Clerk of the Court using the ECF system and served the following Defendants via USPS mail to:

Centaur Building Services, Inc. Registered Agent: J. Fred Kolb 4401 Ridgewood Avenue, St. Louis, MO, 63116

/s/ Mary Anne Sedey

Case: 4:21-cv-00284-JAR Doc. #: 1-1 Filed: 03/05/21 Page: 46 of 48 PageID #: 54



CITY OF ST LOUIS

SPECIAL PROCESS SERVER

IN THE 22ND JUDICIAL CIRC	UIT, CITY OF ST LOUIS, MISSOURI	
Judge or Division: MICHAEL FRANCIS STELZER	Case Number: 2122-CC00246	Special Process Server 1 W STAGE
Plaintiff/Petitioner: JAYNE SALERNO vs.	Plaintiff's/Petitioner's Attorney/Address MARY ANNE OLWELL SEDEY 2711 CLIFTON AVE ST LOUIS, MO 63139-2712	Special Process Server 2 Special Process Server 3
Defendant/Respondent: CENTAUR BUILDING SERVICES , INC. Nature of Suit: CC Employmnt Discrmntn 213.111	Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	(Date File Stamp)
	mmons in Civil Case	
copy of which is a plaintiff/petitioner exclusive of the da	d to appear before this court and to file your put tached, and to serve a copy of your pleading at the above address all within 30 days after ray of service. If you fail to file your pleading, jugo for the relief demanded in the petition.	upon the attorney for eceiving this summons,

February 25, 2021

Thomas Kloeppinger

	Date		Clerk	
	Further Information:			
		Sheriff's or Server's Return		
Note to serving officer	: Summons should be ret	turned to the court within 30 days afte	er the date of issue.	
I certify that I have serve	ed the above summons by	y: (check one)		
☐ leaving a copy of the	summons and a copy of	of the petition to the defendant/respo the petition at the dwelling place or u , a person of the de	usual abode of the defendant/res	
	anently resides with the d			
		y of the summons and a copy of the		()
		(name)		
other:				·
Served at				(address)
in	(County/C	City of St. Louis), MO, on	(date) at	(time)
		notary public if not served by an author to before me on		
(Seal)	My commission expires	o.		
	iviy commission expires	Date	Notary Public	
Sheriff's Fees, if applical	ble			
Summons	\$			
Non Est	\$			
Sheriff's Deputy Salary				
Supplemental Surcharge	\$ <u>10.00</u>			
Mileage	\$(miles @ \$ per mile)		
Total	\$			
A copy of the summons a		must be served on each defendant/re	espondent. For methods of servi	ce on all

Case: 4:21-cv-00284-JAR Doc. #: 1-1 Filed: 03/05/21 Page: 47 of 48 PageID #: 55



SPECIAL PROCESS SERVER

CUIT, CITY OF ST LOUIS, MISSOURI	
Case Number: 2122-CC00246	Special Process Server 1 W STAGE
Plaintiff's/Petitioner's Attorney/Address MARY ANNE OLWELL SEDEY 2711 CLIFTON AVE S. ST LOUIS, MO 63139-2712	Special Process Server 2 Special Process Server 3
Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101	(Date File Stamp)
ummons in Civil Case	
ned to appear before this court and to file your attached, and to serve a copy of your pleading er at the above address all within 30 days after day of service. If you fail to file your pleading, you for the relief demanded in the petition.	g upon the attorney for receiving this summons, judgment by default may
	Case Number: 2122-CC00246 Plaintiff's/Petitioner's Attorney/Address MARY ANNE OLWELL SEDEY 2711 CLIFTON AVE ST LOUIS, MO 63139-2712 Court Address: CIVIL COURTS BUILDING 10 N TUCKER BLVD SAINT LOUIS, MO 63101 ummons in Civil Case WEST LLC ned to appear before this court and to file your attached, and to serve a copy of your pleading or at the above address all within 30 days after day of service. If you fail to file your pleading, you for the relief demanded in the petition.

or Information:

Date

	Further Information:			
	Sher	riff's or Server's Return		
Note to serving officer	: Summons should be returne	ed to the court within 30 days aft	er the date of issue.	
I certify that I have serve	ed the above summons by: (cl	heck one)		
delivering a copy of t	he summons and a copy of th	e petition to the defendant/resp	ondent.	
			usual abode of the defendant/res efendant's/respondent's family ove	
15 years who perma	anently resides with the defen	dant/respondent.	,	J
		he summons and a copy of the		
		(name)		(title).
other:				
Served at				_ (address)
in	(County/City o	of St. Louis), MO, on	(date) at	(time).
Printed Nam	ne of Sheriff or Server	ry public if not served by an auth	Signature of Sheriff or Server	
		efore me on		
(Seal)	Subscribed and sworn to be		(uate).	
(SSS.)	My commission expires:			
	,	Date	Notary Public	
Sheriff's Fees, if applical	ole			
Summons	\$			
Non Est	\$			
Sheriff's Deputy Salary	· · · · · · · · · · · · · · · · · · ·			
Supplemental Surcharge	\$ <u>10.00</u>			
Mileage	\$(miles @ \$ per mile)		

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all

classes of suits, see Supreme Court Rule 54.

Clerk

Case: 4:21-cv-00284-JAR Doc. #: 1-1 Filed: 03/05/21 Page: 48 of 48 PageID #: 56



Mileage

SPECIAL PROCESS SERVER

IN THE 22ND JUDICIAL CIRCUIT. CITY OF ST LOUIS. MISSOURI

	Т			1
Judge or Division:		Case Number: 2122-CC00	1246	Special Process Server 1
MICHAEL FRANCIS STE				W STAGE
Plaintiff/Petitioner:		Plaintiff's/Petitioner's Attorne		
JAYNE SALERNO		MARY ANNE OLWELL SEC	DEY	Special Process Server 2
		2711 CLIFTON AVE	_	
		ST LOUIS, MO 63139-2712	<u> </u>	Special Process Server 3
Defendant/Respondent:		Court Address:		
CENTAUR BUILDING SI		CIVIL COURTS BUILDING 10 N TUCKER BLVD		
Nature of Suit:		SAINT LOUIS, MO 63101		
CC Employmnt Discrmntr	1 213.111	SAINT EOOIS, WO 03101		(Date File Stamp)
	Sum	nmons in Civil Case	Э	
The State of Missouri t	o: CENTAUR BUILDING			
The Glate of Micocarre	Alias: ATALIAN GLC			
C/O J FRED KOLB RAGT	Alias. ATALIAN OLO	DAL CERVICES IIVO		
4401 RIDGEWOOD AVE				
SAINT LOUIS, MO 63116				
COURT SEAL OF		to appear before this cour		
COURTOS		ached, and to serve a copy		
		the above address all wit		
		of service. If you fail to fil		dgment by default may
	be taken against yo	u for the relief demanded i		
*BCCCS.#	Echruary 25	2024	Thomas Kloy	n n
CITY OF ST LOUIS	February 25,	2021	, ,,,,,,	Jugar
	Date		Clerk	
	Further Information:			
		eriff's or Server's Return		
Note to serving officer		ed to the court within 30 days a	after the date of issue.	
_	ed the above summons by: (-		
	- 1	he petition to the defendant/res	spondent	
		petition at the dwelling place o		lefendant/respondent with
		, a person of the		nt's family over the age of
	anently resides with the defe	ndant/respondent.		
(for service on a corp	ooration) delivering a copy of	the summons and a copy of the	e complaint to:	
		(name)		(title).
other:				
Sorved at				(address)
Served at				•
in	(County/City	of St. Louis), MO, on	(dat	e) at (time).
Printed Nan	ne of Sheriff or Server		Signature of She	eriff or Server
		ary public if not served by an aut		
	Subscribed and sworn to b	efore me on		(date).
(Seal)				
	My commission expires: _			
		Date	Nota	ary Public
Sheriff's Fees, if applica				
Summons	\$			
Non Est	\$			
Sheriff's Deputy Salary				
Supplemental Surcharge	\$10.00			

classes of suits, see Supreme Court Rule 54.

_ miles @ \$.____ per mile)

A copy of the summons and a copy of the petition must be served on each defendant/respondent. For methods of service on all